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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

SHARON TEAGUE and RANDALL TEAGUE,
Individually, and in their official capacity as Co-
Personal Representatives of the ESTATE OF
MARK RANDALL TEAGUE,

Plaintiffs,

v.

REMINGTON ARMS COMPANY, LLC;
REMINGTON OUTDOOR COMPANY, INC.;
SPORTING GOODS PROPERTIES, INC.; E.I.
DU PONT DE NEMOURS & COMPANY;

DOES A to K,

CV 18-184-M-DLC

**PLAINTIFFS' MOTION
TO COMPEL 30(b)(6)
WITNESS FOR ORAL
DEPOSITION**

Defendants.

COMES NOW, Plaintiffs' and file their Motion to Compel 30(b)(6) Witness for Oral Deposition.

On April 24, 2020, Teagues filed a timely Second Notice of 30(b)(6) Deposition requesting Defendants produce a corporate representative to testify on May 27, 2020, *inter alia*, about 15 documents regarding DuPont and its relationship to other Defendants and the legal and financial relationships DuPont had with those representatives. Less than a week before, at a meet and confer, Defense Counsel asked to delay that portion of the deposition but did not file a Rule 26 motion for protective order or otherwise object to the Notice. As described in the Ramler Declaration and the Teagues' Brief, Plaintiffs made good faith efforts to resolve this, but in the end, Defendants refused to provide the witness that was timely noticed and never filed any Motion for Protective Order.

Plaintiffs' therefore request this Court compel Defendants, including Sporting Good Properties, Inc. and DuPont, to produce a 30(b)(6) witness for oral deposition on the topics in their timely notice regarding Dupont's financial and legal relationships with the other Defendants, alter ego, and punitive damages.

As required by L.R. 26.3(c)(1), the parties have had many meet and confer meetings via phone to try to resolve the disputed issues. Pursuant to L.R. 7.1(c)(1), Defense counsel was contacted and they object to this Motion.

DATED this 14th day of July, 2020.

RAMLER LAW OFFICE, P.C.

By: /s/ Richard A. Ramler
Richard A. Ramler

MCKENNA & STARIN, PLLC

ROSSBACH LAW, PC

Attorneys for Plaintiff

CERTIFICATION OF COMPLIANCE WITH L.R. 26.3(c)(1)

As required by L.R. 26.3(c)(1), the parties have communicated several times via phone conversation and detailed letter correspondence to attempt to meet and confer.

CERTIFICATION OF COMPLIANCE WITH SCHEDULING ORDER

As required under the Scheduling Order, Counsel certifies it advised Plaintiffs that the loser will pay the opposing party's associated fees and costs.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon the following individuals by the means designated below this 14th day of July, 2020:

[X] CM/ECF Clerk, U.S. District Court

[X] CM/ECF Robert M. Carlson
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[X] CM/ECF Dale G. Wills
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/s/ Richard A. Ramler
Richard A. Ramler